

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION**

VIRTAMOVE, CORP.,

Plaintiff,

v.

AMAZON.COM, INC.; AMAZON.COM
SERVICES LLC; AND AMAZON WEB
SERVICES, INC.,

Defendant.

Case No. 7:24-CV-00030-DC-DTG

JURY TRIAL DEMANDED

**JOINT MOTION FOR EXTENSION OF TIME FOR DEFENDANTS TO ANSWER
OR OTHERWISE RESPOND TO PLAINTIFF’S FIRST AMENDED COMPLAINT**

Plaintiff VitraMove Corp. (“Plaintiff”) and Defendants Amazon.com, Inc., Amazon.com Services, LLC and Amazon Web Services, Inc. (“Defendants”) hereby jointly move for a 21-day extension of time for Defendants to answer or otherwise respond to Plaintiff’s First Amended Complaint for Patent Infringement.

Defendant’s deadline to answer or otherwise respond to the amended complaint is currently May 17, 2024, and with this 21-day extension, the deadline would be June 7, 2024. This motion is not being brought for the purpose of delay. This extension is necessary because Defendants are investigating new allegations raised for the first time in the Amended Complaint.

Counsel for the parties have conferred and all parties stipulate to this extension. Accordingly, the parties request that the Court grant the motion and enter the attached proposed Order.

May 17, 2024

Respectfully submitted,

/s/ Peter Tong

Reza Mirzaie (CA SBN 246953)

rmirzaie@raklaw.com

Marc A. Fenster (CA SBN 181067)

mfenster@raklaw.com

Neil A. Rubin (CA SBN 250761)

nrubin@raklaw.com

Amy E. Hayden (CA SBN 287026)

ahayden@raklaw.com

Christian W. Conkle (CA SBN 306374)

cconkle@raklaw.com

Jonathan Ma (CA SBN 312773)

jma@raklaw.com

RUSS AUGUST & KABAT

12424 Wilshire Boulevard, 12th Floor

Los Angeles, CA 90025

Telephone: (310) 826-7474

Qi (Peter) Tong (TX SBN 24119042)

ptong@raklaw.com

RUSS AUGUST & KABAT

4925 Greenville Ave, Suite 200

Dallas, TX 75206

Attorneys for Plaintiff VirtaMove, Corp.

Of Counsel:

Colin B. Heidman (*Pro Hac Vice*)

Christie R.W. Matthaei (*Pro Hac Vice*)

Logan P. Young (*Pro Hac Vice*)

KNOBBE MARTENS OLSON & BEAR LLP

925 4th Ave, Ste 2500

Seattle, WA 98104

Telephone: 206-405-2000

Facsimile: 206-405-2001

colin.heidman@knobbe.com

christie.matthaei@knobbe.com

logan.young@knobbe.com

Joseph R. Re (*Pro Hac Vice*)

Jeremy A. Anapol (*Pro Hac Vice*)

KNOBBE MARTENS OLSON & BEAR LLP

2040 Main Street, 14th Floor

Irvine, CA 92614

Telephone: 949-760-0404

Facsimile: 949-760-9502

joe.re@knobbe.com

jeremy.anapol@knobbe.com

LYNCH, CHAPPELL & ALSUP

A Professional Corporation

Suite 700

300 N. Marienfeld,

Midland, Texas 79701

Telephone: 432-683-3351

Telecopier: 432-683-2587

By: /s/ Harper Estes

Harper Estes

Texas Bar No. 00000083

hestes@lcalawfirm.com

*Attorneys for Defendants Amazon.com,
Inc., Amazon.com Services, LLC and
Amazon Web Services, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on May 17, 2024, all counsel of record who are deemed to have consented to electronic service were served with a copy of the foregoing via the Court's CM/ECF System.

/s/ Harper Estes

Harper Estes